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Subject: Comments on Issue Summary Table
Date: 08/22/2006 01:50 PM

Eric,

Here are some quick comments on the issue summary table:

Would it be possible to see the e-mail from John Toll that is cited several times in the ecological risk assessment and food web model sections?

Ecological Risk Assessment:

Measurement Endpoint Table: The final version was not in the PRG memo from EPA. I am assuming Bob commented on this already, but we have made some changes to make it consistent with the WOE effort. Bob made those changes and has since sent out a revised measurement endpoint table. We need to agree on the lines of evidence for the benthic community soon. Should we schedule that discussion?

Summation Rules: The summation rules should be consistent between the HH and Eco effort regardless of exposure areas. However, it is the exposure areas that need to be defined. This is related to the need to see and agree on how they are calculating exposure point concentration calculations ASAP.

Dietary Composition: It states "EPA has provided comments on dietary composition through PRE and Food Web Model review process." We did provide comments on the dietary approach for the food web model, however, I would like to confirm that this extended also to the dietary approach for risk to fish in the ecological risk assessment. If so, we did not agree on the dietary matrix for each receptor (not all included in the food web model), and it is unclear if we agreed to evaluate the dietary matrix probabilistically for the ecological risk assessment (not the FWM).

Exposure Point Concentrations and Spatial Scale: For receptor risk calculations (not the FWM) we need to agree on the how the exposure point concentrations will be calculated. This exercise will effectively deal with spatial scale issues and summation rules in that both things need to be considered in these calculations. Having them run through their calculations will be a great check in on several very important issues very relevance to ensuring the Round 2 Report is close to the mark.

For the FWM (may apply to the section below as well), I still think is an issue with the average sediment concentration going into the FWM, and the PRGs coming out - what do they mean and how are they applying them? The best way to handle this is for the PRGs to be represented probabilistically (which goes against some text in this table from John Toll?). If they aren't going to represent the uncertainty in the PRG in that manner, they are going to have to be very clear about the uncertainty in other ways, and explicit in how the "average sediment concentration" was calculated. In the last FWM, there were no details provided on how that "magic number" was calculated, but this cannot be a black box. This issue has come up on the Duwamish (I am sure you saw those e-mails) but there has been little discussion within this project on what method should be used. However, there are implications that would ideally be vetted before another iteration of the FWM.

Food Web Model:

Dietary Matrix: Has a table with parameter ranges been prepared by the LWG and reviewed by the government team?

Surface Area Average Concentrations: A range will be presented, but what methodology for

calculating the average concentration will be used?

Other issues:

You may be tracking them in other ways, but other issues have also come up that require a check in, including BSAFs

-Jennifer